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THE HONORABLE MARY K. DIMKE

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

ROBERT THEODORE
KINNUNE,

Plaintiff,

vs.

STATE OF WASHINGTON,
WASHINGTON STATE
DEPARTMENT OF SOCIAL
AND HEALTH SERVICES,

Defendants.

NO. 2:23-cv-00026-MKD

THIRD DECLARATION OF
TAYLOR M. HENNESSEY
IN SUPPORT OF
DEFENDANTS' MOTION
FOR SUMMARY
JUDGMENT

I, Taylor M. Hennessey, declare and state as follows:

1. I am over the age of 18, competent to testify and make this declaration on personal knowledge.

2. Attached as Exhibit X are true and correct excerpts of the transcript of the deposition of Robert Kinnune.

3. Attached as Exhibit Y are true and correct excerpts of the transcript of the deposition of Joey Frost.

I declare under the penalty of perjury under the laws of the United States

THIRD DECLARATION OF
TAYLOR M. HENNESSEY IN
SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT

1 of America that the foregoing is true and correct.

2 DATED this 2 day of January, 2024, in Spokane County, Washington.

3 ROBERT W. FERGUSON
4 Attorney General

5 s/Taylor M. Hennessey
6 TAYLOR M. HENNESSEY, WSBA No. 54135
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CERTIFICATE OF SERVICE

I certify that I electronically filed this document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 2 day of January, 2024, at Spokane, Washington.

ROBERT W. FERGUSON
Attorney General

s/ Taylor Hennessey
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